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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RICHARD ZEITLIN, ADVANCED
TELEPHONY CONSULTANTS, MRZ
MANAGEMENT, LLC, DONOR
RELATIONS, LLC, TPFE, INC., AMERICAN
TECHNOLOGY SERVICES, COMPLIANCE
CONSULTANTS, CHROME BUILDERS
CONSTRUCTION, INC., and UNIFIED
DATA SERVICES.

Plaintiffs,

V.

BANK OF AMERICA, N.A., and JOHN and JANE DOES 1-100,

Defendants.

Case No.: 2:18-cv-01919-RFB-DJA

**STIPULATION AND ORDER
EXTENDING DEADLINES FOR
BRIEFING ON DISCOVERY
MOTIONS**

(SECOND REQUEST)

Pursuant to Local Rule IA 6-1, Plaintiffs Richard Zeitlin, Advanced Telephony Consultants, MRZ Management, LLC, Donor Relations, LLC, TPFE, Inc., American Technology Services, Compliance Consultants, Chrome Builders Construction, and Unified Data Services (“Plaintiffs”) and Defendant Bank of America, N.A. (“BANA” and together with Plaintiffs the “Parties” and each a “Party”), through their counsel of record hereby stipulate to a modest

1 extension of existing briefing deadlines in connection with (i) Plaintiffs' Motion to Compel
 2 Discovery and For Attorney's Fees (ECF No. 48), filed under seal on May 26, 2020 ("Motion to
 3 Compel") and (ii) Plaintiffs' Motion to Unseal Court Documents (ECF No. 52) filed on June 4,
 4 2020 ("Motion to Unseal"). The Parties respectfully request the Court enter this Stipulation as an
 5 Order. In support of this request, the Parties represent as follows.

6 Plaintiffs' motions raise a number of complex issues of fact and law. The Parties agree
 7 that there is good cause for the modest extension of the briefing schedule requested herein in
 8 order to allow them further time to analyze these issues and prepare an appropriate response or
 9 papers in further support. In addition, the ongoing effects of the COVID-19 pandemic continue to
 10 affect the ability of the parties and their counsel to respond to the motions at issue. In particular,
 11 the BANA employees with the knowledge of the relevant facts continue to operate from a remote
 12 environment which limits ability to research the factual issues raised in the motion. Counsel faces
 13 similar issues, which also pose challenges related to child care.

14 The Parties agree that the foregoing constitutes good cause to extend the deadlines as
 15 requested herein. This is the Parties' second request for an extension of the deadlines related to
 16 the Motion to Compel and their first request for an extension of the deadlines related to the
 17 Motion to Unseal. The Parties agree that the requested extensions will not prejudice any Party. No
 18 deadline for which an extension is requested herein has expired.

19 Accordingly, the Parties agree there is good cause for entry of the following new
 20 deadlines:

21 1. BANA's time to file papers in response to the Motion to Compel is extended from
 22 June 16, 2020 to June 22, 2020;

23 2. Plaintiffs' time to file reply papers in further support of the Motion to Compel is
 24 extended from June 26, 2020 to July 2, 2020;

25 3. BANA's time to file papers in response to the Motion to Unseal is extended from
 26 June 18, 2020 to June 25, 2020;

27 4. Plaintiff's time to file reply papers in further support of the Motion to Unseal is
 28 extended from June 25, 2020 to July 6, 2020.

1 **IT IS SO STIPULATED.**

2 Dated: June 15, 2020

DATED: June 15, 2020

3 THE BERNHOFT LAW FIRM, S.C.

SNELL & WILMER L.L.P.

4 /s/ Robert G. Bernhoft (with permission)
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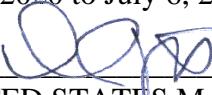
15 **ORDER**

16
17 **IT IS HEREBY ORDERED** that BANA's time to file papers in response to the Motion
to Compel is extended from June 16, 2020 to June 22, 2020;

18
19 **IT IS FURTHER ORDERED** that Plaintiffs' time to file reply papers in further support
of the Motion to Compel is extended from June 26, 2020 to July 2, 2020;

20
21 **IT IS FURTHER ORDERED** that BANA's time to file papers in response to the Motion
to Unseal is extended from June 18, 2020 to June 25, 2020; and

22
23 **IT IS FURTHER ORDERED** that Plaintiff's time to file reply papers in further support
of the Motion to Unseal is extended from June 25, 2020 to July 6, 2020.

24
25 
UNITED STATES MAGISTRATE JUDGE

26
27 DATED: June 16, 2020

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing **STIPULATION AND ORDER EXTENDING DEADLINES FOR BRIEFING ON DISCOVERY MOTIONS (SECOND REQUEST)** with the Clerk of the Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: June 15, 2020

/s/ Lara J. Taylor

An Employee of Snell & Wilmer L.L.P.

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